

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GOVERNMENT EMPLOYEES INSURANCE CO.,
GEICO INDEMNITY CO., GEICO GENERAL
INSURANCE COMPANY and GEICO CASUALTY
CO.

Plaintiffs,

v.

MIKHAIL STRUTSOVSKIY, M.D.
a/k/a MICHAEL STRUTSOVSKIY, M.D.,
RES PHYSICAL MEDICINE & REHABILITATION
SERVICES, P.C.,
AARON HIRSCH,
DEAN TRZEWIECZYNSKI,
KENNETH ANDRUS,
VASCU.FLO, INC., and
VASCUSCRIPT, INC.

Docket No.: 12-CV-0330

Defendants.

NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that pursuant to Rule 56(c) of the Federal Rules of Civil Procedure, and upon the accompanying Attorney Affirmation, Affidavit of Dr. Strut, Exhibits 1 to 18 and supporting Memorandum of Law, Defendants Mikhail Strutsovskiy, M.D. a/k/a Michael Strut, M.D., and RES Physical Medicine & Rehabilitation Services, P.C. (collectively the “Strutsovskiy Defendants”), by and through their attorneys The Knoer Group, PLLC., jointly and respectfully move this Court at United States District Court, 2 Niagara Square, Buffalo, New York, at a time and date to be determined by this Court, for an Order granting Strutsovskiy Defendants’ Motion for Summary Judgment.

PLEASE TAKE FURTHER NOTICE, that Strutsovskiy Defendants intend to file and serve reply papers. Therefore, Plaintiffs are required to file and serve responding papers as set forth in the Scheduling Order to be issued by the Court.

Dated: October 31, 2014
Buffalo, New York

/s/Robert E. Knoer
Robert E. Knoer, Esq.
THE KNOER GROUP, PLLC
Attorneys for Defendants
Mikhail Strutsovskiy, M.D.
a/k/a Michael Strutsovskiy, M.D.,
RES Physical Medicine &
Rehabilitation Services, P.C.
424 Main Street, Suite 1820
Buffalo, New York 14202
(716) 332-0032
Fax: 716-362-8748
Email: rknoer@knoergroup.com